

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

BOBBY MIRELES, *at al.*,

Plaintiffs

V.

A.R.S. ADVANCED RESTORATION
SOLUTIONS, INC. d/b/a PAUL DAVIS
RESTORATION OF GREATER HOUSTON
JOE SOUZA, CHAD GOLSON, and
JOHN SIMMONS

Defendants.

C.A. NO. 4:10-CV-05206

ANSWER

Defendants, ARS Advanced Restoration Solutions, Inc. d/b/a Paul Davis Restoration of Greater Houston ("ARS"), Joe Souza, Chad Golson and John Simmons (the "Individual Defendants") (ARS and the Individual Defendants being hereinafter collectively referred to as "Defendants") file the following Answer to Plaintiff's Complaint:

1. Defendants admit the material allegations of paragraph 1 of Plaintiff's complaint.
2. Defendants deny the material allegations of paragraph 2 of Plaintiff's complaint.
3. Defendants admit the material allegations of paragraph 3 of Plaintiff's complaint.
4. Defendants admit the material allegations of paragraph 4 of Plaintiff's complaint.
5. Defendants admit the material allegations of paragraph 5 of Plaintiff's complaint.
6. Defendants admit the material allegations of paragraph 6 of Plaintiff's complaint.
7. Defendants deny the material allegations of paragraph 7 of Plaintiff's complaint.
8. Defendants admit the material allegations of paragraph 8 of Plaintiff's complaint.

9. Defendants admit the material allegations of paragraph 9 of Plaintiff's complaint.

10. Defendants deny the material allegations of paragraph 10 of Plaintiff's complaint.

11. Defendants admit the material allegations of paragraph 11 of Plaintiff's complaint.

12. Defendants admit the material allegations of paragraph 12 of Plaintiff's complaint.

13. Defendants admit the material allegations of paragraph 13 of Plaintiff's complaint.

14. Defendants admit that they are in the business of restoring, reconstructing and remodeling both residential and commercial properties, and deny the remaining allegations of paragraph 14 of Plaintiff's complaint.

15. Defendants admit the material allegations of paragraph 15 of Plaintiff's complaint.

16. Defendants admit the material allegations of paragraph 16 of Plaintiff's complaint.

17. Defendants admit the material allegations of paragraph 17 of Plaintiff's complaint.

18. Defendants deny the material allegations of paragraph 18 of Plaintiff's complaint.

19. Defendants deny the material allegations of paragraph 19 of Plaintiff's complaint.

20. Defendants deny the material allegations of paragraph 20 of Plaintiff's complaint.

21. Defendants deny the material allegations of paragraph 21 of Plaintiff's complaint.

22. Defendants deny the material allegations of paragraph 22 of Plaintiff's complaint.

23. Defendants deny the material allegations of paragraph 23 of Plaintiff's complaint.

24. Defendants do not have sufficient information to admit or deny the material allegations of paragraph 24 of Plaintiff's complaint.

25. Defendants incorporate their responses to paragraphs 1-24.

26. Defendants deny the material allegations of paragraph 26 of Plaintiff's complaint.

27. Defendants deny the material allegations of paragraph 27 of Plaintiff's complaint.

28. Defendants deny the material allegations of paragraph 28 of Plaintiff's complaint.

- 29. Defendants deny the material allegations of paragraph 29 of Plaintiff's complaint.
- 30. Defendants admit the material allegations of paragraph 30 of Plaintiff's complaint.
- 31. Defendants deny the material allegations of paragraph 31 of Plaintiff's complaint.

Respectfully submitted,

By: /s/ Stephen W. Schueler

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**ATTORNEYS FOR DEFENDANT A.R.S.
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INC. d/b/a PAUL DAVIS RESTORATION OF
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GOLSON, and JOHN SIMMONS.**

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CERTIFICATE OF SERVICE

This is to certify that on the 15th day of February, 2011, a true and correct copy of the foregoing was forwarded to all counsel of record by certified mail, return receipt and by facsimile transmission as follows:

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*Via telecopier (713) 659-2601 and
CM RRR*

/s/ Stephen W. Schueler
Stephen W. Schueler